

UNITED STATES BANKRUPTCY COURT  
for the Eastern District of Pennsylvania

In re :  
Keith M. Scriven : Case No. 22 - 11818  
Debtor. : (Chapter 11)  
: Hon. Ashely M. Chan  
:

Debtor's Objection to Proposed Order

AND NOW, comes Debtor, Keith M. Scriven, by and through his attorney, Ronald G. McNeil, Esquire, hereby objects to the proposed Amended Order filed by Ajax Mortgage ("Ajax") [ECF # 105], and, in support thereof, states as follows:

1. Ajax's counsel submitted this proposed Order to Debtor's counsel before its filing.
2. Debtor's counsel complained that
  - a) Paragraph # 2 of this proposed Order exceeds the terms of the August 22, 2022 Stipulation Order.  
The ". . . or any other person claiming an interest in the Property . . ." language is different from "or an entity or person related to Debtor" type language.
  - b) Paragraph # 3 of this proposed Order is not a provision within the terms of the August 22, 2022 Stipulation Order.  
Debtor has not agreed to waive Rule 4001(a)(3).
3. If applicable, Ajax should only obtain In Rem relief consistent with the terms of the August 22, 2022 Stipulation Order.

WHEREFORE, Debtor respectfully requests that Honorable Court to disregard this proposed Order and to order such other and further relief as is just and proper.

Respectfully submitted,

/s/ Ronald G. McNeil  
Ronald G. McNeil, Esquire  
Attorney for Debtor  
DATE: March 14, 2023  
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CERTIFICATE OF SERVICE

Pursuant to Rules 5005-2(d) and 9014-4(a) of the Local Bankruptcy Rules, I, Ronald G. McNeil, Esquire, hereby certify that I electronically filed the foregoing Debtor's Objection to Proposed Order with the Clerk of U.S. Bankruptcy Court by using the CM/ECF system on March 14, 2023.

I certify that all the interested parties in this case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Ronald G. McNeil  
Ronald G. McNeil, Esquire  
Attorney for Debtor  
DATE: March 14, 2023